

Renée E. Rothauge, OSB #903712
ReneeRothauge@markowitzherbold.com
MARKOWITZ HERBOLD PC
Suite 3000, Pacwest Center
1211 SW Fifth Avenue
Portland, OR 97204-3730
Telephone: (503) 295-3085
Fax: (503) 323-9105

Michael J. Summersgill (*pro hac vice*)
Michael.summersgill@wilmerhale.com
Jordan L. Hirsch (*pro hac vice*)
Jordan.hirsch@wilmerhale.com
Sarah B. Petty (*pro hac vice*)
Sarah.petty@wilmerhale.com
WILMERHALE
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Fax: (617) 526-5000

Grant K. Rowan (*pro hac vice*)
Grant.rowan@wilmerhale.com
WILMERHALE
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 663-6000
Fax: (202) 663-6011

Arthur W. Covielo (*pro hac vice*)
Arthur.covielo@wilmerhale.com
WILMERHALE
950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6000
Fax: (650) 858-6100

Attorneys for Intel Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

MEMORY INTEGRITY, LLC,

Case No.: 3:15-cv-00262-SI

Plaintiff,

v.

INTEL CORPORATION,

**STIPULATION REGARDING PUBLIC
AVAILABILITY OF PRIOR ART**

Defendant.

Plaintiff Memory Integrity, LLC (“Memory Integrity”) and Defendant Intel Corporation (“Intel”), by and through their designated counsel, hereby agree and stipulate as follows: The Anthony Nguyen, “High-Throughput Coherence Controllers,” PhD Thesis, University of Illinois at Urbana-Champaign—cited in Intel’s December 11, 2015 Notice of Election of Prior Art References and attached hereto as Exhibit 1—was made publicly available at least as of March 13, 2002 through ProQuest LLC. (*See, e.g.*, Ex. 2 [88222INTELMI2509550-88222INTELMI2509667] (sworn declaration of Carol Wadke of ProQuest LLC and accompanying copy of Mr. Nguyen’s thesis from ProQuest’s files); *see also* 88222INTELMI2509765 (excerpt of May 2002 edition of Dissertation Abstract International citing Mr. Nguyen’s thesis).) Memory Integrity will not hereafter dispute these dates of public availability throughout the course of the above-captioned litigation.

Dated: April 11, 2016

/s/ Jonathan Baker

Jonathan Baker (appearing *pro hac vice*)
Michael Saunders (appearing *pro hac vice*)
Gurtej Singh (appearing *pro hac vice*)
FARNEY DANIELS PC
411 Borel Avenue, Suite 350
San Mateo, California 94402
Telephone: (424) 278-5200
jbaker@farneydaniels.com
msaunders@farneydaniels.com
tsaunders@farneydaniels.com

Bryan Atkinson (appearing *pro hac vice*)
FARNEY DANIELS PC
800 S. Austin Avenue, Suite 200
Georgetown, Texas 78626
Telephone: (512) 582-2828
batkinson@farneydaniels.com

John Mansfield, OSB No. 055390
MANSFIELDLAW
121 SW Morrison Ave., Suite 400
Portland, OR 97204
Telephone: 971.271.8615
john@mansfieldlaw.net

Attorneys for Plaintiff
Memory Integrity, LLC

Respectfully submitted,

/s/ Renée E. Rothauge

Renée E. Rothauge, OSB #903712
MARKOWITZ HERBOLD PC
Suite 3000, Pacwest Center
1211 SW Fifth Avenue
Portland, OR 97204-3730
ReneeRothauge@markowitzherbold.com

Michael J. Summersgill (*pro hac vice*)
Jordan L. Hirsch (*pro hac vice*)
Sarah B. Petty (*pro hac vice*)
WILMERHALE LLP
60 State Street
Boston, MA 02109
michael.summersgill@wilmerhale.com
jordan.hirsch@wilmerhale.com
sarah.petty@wilmerhale.com

Grant K. Rowan (*pro hac vice*)
WILMERHALE LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Grant.rowan@wilmerhale.com

Arthur W. Coviello (*pro hac vice*)
WILMERHALE LLP
950 Page Mill Road
Palo Alto, CA 94304
Arthur.coviello@wilmerhale.com

Attorneys for Defendant
Intel Corporation